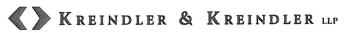
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750 Third Avenue New York, NY 10017-2703 (212) 687-8181 Fax: (212) 972-9432 www.kreindler.com

amaloney@kreindler.com 212-973-3438

December 1, 2015

Honorable Frank Maas United States Magistrate Judge for the Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007-1312

> In re Terrorist Attacks on September 11, 2001, MDL 03-1570 (GBD) (FM) Re: Ashton et al. v. Al Qaeda Islamic Army et al., 02 CV 6977 (GBD/FM)

Dear Judge Maas,

We are filing this letter-motion to request that the Court grant the attached amended proposed order of judgment on the Ashton plaintiffs' pre death conscious pain and suffering claims in connection with the judgment by default against Iran entered on August 26, 2015. Also filed with the amended proposed judgment is an Exhibit A listing the 851 decedents included in the Ashton motion. If there is anything else you require please let me know.

Respectfully submitted,

KREINDLER & KREINDLER LLP

By: Andrew J. Maloney

Orohan J. Walovey

AJM/gm Enclosure